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11 *Attorneys for Defendant*
12 *Crème De La Creme, LLC*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 VENESSIA BUMPAS,

16 Case No.

17 Plaintiff,

18 vs.

19 CRÈME DE LA CRÈME, INC., a foreign
20 corporation; DOES 1-10; ROE I-X,

21 **NOTICE TO FEDERAL COURT OF
22 REMOVAL OF CIVIL ACTION
23 FROM STATE COURT**

24 Defendants.

25 Pursuant to 28 U.S.C. § 1332(d), Defendant hereby notifies the Court of the removal of
26 *Venessia Bumpas v. Crème De La Crème, Inc. a foreign corporation, DOES 1-10, and Roe I-X,*
27 Case No. A-22-851247-C, which was filed in the Eighth Judicial District Court in Clark County,
28 Nevada. In support of said removal, Defendant states as follows:

29 1. On April 18, 2022, an action was commenced in the Eighth Judicial District Court
30 of Clark County, Nevada, entitled *Venessia Bumpas v. Crème De La Crème, Inc. a foreign*
31 *corporation, DOES 1-10, and Roe I-X.* A copy of the Complaint is attached hereto as **Exhibit A.**

32 2. Defendant was served with the Summons and Complaint on April 29, 2022, with a
33 copy of the Complaint and a Summons issued by the state court on or about April 18, 2022. A copy
34 of the Summons is attached hereto as **Exhibit B.**

1 3. This action is properly removed to federal court under federal question jurisdiction
2 because Plaintiff's Complaint contains claims which arise under federal law, specifically, 29 U.S.C.
3 § 2612, the Family and Medical Leave Act.

4 4. This Notice of Removal is being filed within thirty (30) days of receipt of any
5 pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely
6 under 28 U.S.C. § 1331 and § 1446(b).

7 5. This action is a civil action of which this Court has original jurisdiction under 28
8 U.S.C. § 1331 and is one which may be removed to this court pursuant to the provisions of 28
9 U.S.C. § 1441(b), in that it is a civil action arising under the Constitution, laws, or treaties of the
10 United States. Specifically, Plaintiff alleges conduct in violation of Title VII of the Civil Rights
11 Act of 1964, 42 U.S.C. §2000e and Title VII of the Civil Rights Act of 1991, 42 U.S.C. §1981.
12 Any remaining state law claims are also properly removed pursuant to the Court's supplemental
13 jurisdiction. 28 U.S.C. § 1367(a).

14 6. Venue is proper in this Court as this is the court for the district and division
15 embracing the place where the action is pending in state Court. 28 U.S.C. § 1391.

16 WHEREFORE, Defendants pray that the above-referenced action now pending in the
17 Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed
18 therefrom to this Court.

19 Dated this 19th day of May, 2022.

JACKSON LEWIS P.C.

/s/ Joshua A. Sliker
JOSHUA A. SLIKER, ESQ.
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KATLYN M. BRADY
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*Attorneys for Defendant
Crème De La Crème, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 19th day of May, 2022, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

6 Kirk T. Kennedy, Esq.
7 815 S. Casino Center Blvd.
Las Vegas, Nevada 89101

*Attorneys for Plaintiff
Venessa Bumpas*

/s/ Wende Hughey
Employee of Jackson Lewis P.C.